

### **U.S. Department of Justice**

United States Attorney Eastern District of New York

MAA/LB/CJN F. #2017R05903

271 Cadman Plaza East Brooklyn, New York 11201

May 14, 2024

#### By Email and ECF

Mark D. Hopson Michael A. Levy Douglas A. Axel Melissa Colon-Bosolet Sidley Austin LLP

David Bitkower Matthew S. Hellman Matthew D. Cipolla Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-3) (AMD)

#### Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

# I. The Government's Discovery

<b>Document Description</b>	Category of Discovery Pursuant to Protective Order	Bates Range
Records regarding Huawei equipment.	Sensitive Discovery Material	DOJ_HUAWEI_A_0123755399 - DOJ_HUAWEI_A_0123755414
Court proceeding minutes related to Deferred Prosecution Agreement regarding Defendant Meng.	Discovery Material ("DM")	DOJ_HUAWEI_A_0123755415 - DOJ_HUAWEI_A_0123755433
Records regarding various legal classifications of certain telecommunications equipment.	DM	DOJ_HUAWEI_A_0123755434 - DOJ_HUAWEI_A_0123755456
Record regarding Federal Communications Commission.	DM	DOJ_HUAWEI_A_0123755457 - DOJ_HUAWEI_A_0123755466
Record regarding an employee of a Huawei vendor.	DM	DOJ_HUAWEI_A_0123755467 - DOJ_HUAWEI_A_0123755468
Records regarding a Huawei employee.	DM	DOJ_HUAWEI_A_0123755469 - DOJ_HUAWEI_A_0123755471
Record regarding Huawei equipment.	DM	DOJ_HUAWEI_A_0123755472 - DOJ_HUAWEI_A_0123755473

Very truly yours,

BREON PEACE United States Attorney Eastern District of New York

By: /s/ Meredith A. Arfa
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#### MARGARET A. MOESER

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### By: /s/ Laura Billings

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### JENNIFER KENNEDY GELLIE

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## By: /s/ Christian Nauvel

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